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Ry. Co., 71 Minn. 438, 74 N. W. 166; *Virginia Ry. & Power Co. v. Godsey*, 117 Va. 167, 83 S. E. 1072. Moreover such penalizing of extra precautionary regulations might discourage their adoption. See *Hoffman v. Cedar Rapids & M. C. Ry. Co.*, 157 Ia. 655, 674, 139 N. W. 165, 172. These rules may, however, be of probative value as a crystallization of operative experience. See *Birmingham Ry. L. & P. Co. v. Morris*, 163 Ala. 190, 50 So. 198; *Deister v. Atchison, T. & S. F. Ry. Co.*, 99 Kan. 525, 539, 162 Pac. 282, 288; 1 WIGMORE, EVIDENCE, § 461. Their admission as such might well lie within the discretion of the trial court. A few cases treat them as circumstances of the defendant's servant's action. *Cincinnati St. Ry. Co. v. Altemeier, Admr.*, 60 Ohio 10, 53 N. E. 300; *St. Louis, S. F. & T. Ry. Co. v. Andrews*, 44 Tex. Civ. App. 426, 99 S. W. 871. This seems sound. As a warning of potential danger and a suggested means of avoiding it, they color the servant's act and are relevant on the question of his negligence. It is otherwise with rules adopted merely to facilitate systematic business operation. *Chabott v. Grand Trunk Ry. Co.*, 77 N. H. 133, 88 Atl. 995; *Bush v. Union Pac. Ry. Co.*, 62 Kan. 709, 713, 64 Pac. 624, 625. The rules in the principal case are clearly precautionary and should have been admitted.

HUSBAND AND WIFE — RIGHTS AND LIABILITIES OF WIFE AS TO THIRD PARTIES — ALIENATION OF AFFECTIONS — ANNULMENT OF MARRIAGE NO DEFENSE. — Plaintiff brought this action against her husband's parents for alienation of affections. While the action was pending, the parents had their son's marriage annulled because he was under the age of consent, as they had a right to do by statute. The trial court directed a verdict for defendants on the ground that the annulment was a bar to this action. *Held*, that a new trial be granted. *Wolf v. Wolf*, 181 N. Y. Supp. 368.

The right of a wife to sue for alienation of her husband's affections, though denied at common law, has been almost universally recognized since the married women's acts. *Foot v. Card*, 58 Conn. 1, 18 Atl. 1027; *Nolin v. Pearson*, 101 Mass. 283, 77 N. E. 890. The parents of the alienated spouse may be liable in such an action as well as a stranger, though in a suit against parents malice must be shown. *Hutcheson v. Peck*, 5 Johns. 196; *Lannigan v. Lannigan*, 222 Mass. 198, 110 N. E. 285. The marriage of persons under the age of consent is not void, but voidable merely by judicial decree. *State v. Lowell*, 78 Minn. 166, 80 N. W. 877; *People v. Ham*, 206 Ill. App. 543. The effect of a decree of annulment at common law was to make the marriage void from the outset, but in order to protect children born of voidable unions some jurisdictions save their legitimacy by statute. MASS. REV. LAWS (1902), c. 151, § 13; IND. STATS. (1901) Art. 7, § 1037. Others make the marriage void only from the date of the decree. *Harrison v. State*, 22 Md. 468. See 1909 N. Y. CONSOL. LAWS, c. 14, § 7. Until that moment each party has a right to the conjugal society of the other. See *Price v. Price*, 124 N. Y. 589, 599, 27 N. E. 383, 385. It follows that under the New York type of statute a subsequent dissolution of the marriage relationship will not prevent the injured spouse from recovering damages for the violation of her legal rights occurring between the marriage and the annulment. *Luke v. Hill*, 137 Ga. 159, 73 S. E. 345.

HUSBAND AND WIFE — WIFE'S SEPARATE ESTATE — EXECUTION AGAINST HUSBAND'S INTEREST IN ESTATE BY ENTIRETY. — Husband and wife held land as tenants by entirety. Judgment creditors of the husband brought a bill in equity praying that the court apply, to the satisfaction of their judgment, the rents and profits of the land so held. The defendant demurred. *Held*, that the demurrer be sustained. *Ohio Butterine Co. v. Hargrave*, 84 So. 376 (Fla.).